



July 21, 1999

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Office of the Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Dear Sirs:

I am writing to submit comments in the rulemaking proceeding to establish a Low Power FM broadcast service. I write as a Market Manager for Sunburst Media, LP, in Springfield, MO.

As a female broadcaster, I am adamantly opposed to "Microradio". The reckless manner in which the Commission is pursuing the issue will result in community, audience, and financial losses that will unlikely be corrected for years to come. I ask that you hear my specific situation, and bear in mind just what the impact in Springfield, MO and medium and small markets just like this would be.

Microradio gives me none of the opportunities to better myself and my family, unlike the "Minority Myth" believed by some commissioners. One has only to look to Wall Street for proof that women and minorities still have the potential to attract investors if they are good operators. What will be the definition of a "good operator" for LPFM? One who takes away just enough business from currently viable properties to force those stations to eliminate their news and community service? One who contributes to signal deficiencies that disallow the current audiences to receive the same broadcasts they have consistently relied upon? Count me out of that "opportunity" and allow me to compete in today's environment.

It is a complete lie that LPFM will not interfere with the FM band. An engineering study that will not be completed until the fall of 1999 will show significant interference issues, yet the Commission refuses to extend the comment date beyond August 2, 1999. The public will not be provided to opportunity to review and comment on these studies, a violation of the Administrative Procedures Act. Third-adjacent channel and even second channel protection will devastate the signals that are my responsibility to operate. That is a fact.

I am proud to be the leading broadcast property in this market in providing public service to this community, a claim I can verify. Interference in signal would endanger continuing this great work. Profitability is a reality; nothing is truly "free". How can I continue to staff, consult, provide airtime and promotion, and ascertain needs in this community if five to fifteen new signals force departmental cuts to maintain even marginal operating profit? The public service messages we transmit will be not reach the current audience levels due to interference. If LPFM wins, the public loses.

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KGBX FM ♦ KGMV FM ♦ KXUS FM ♦ KTOZ FM ♦ KGMV AM

Broadcast Plaza ♦ 1856 South Glenstone ♦ Springfield, MO 65804 ♦ (417) 890-5555 ♦ FAX (417) 890-5050



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Seven percent of the advertising revenues belong to radio. We are in one of the most competitive industries and DAB has yet to arrive. Small to medium markets like Springfield, my hometown, will not continue to provide the opportunity for me or many members of my staff to remain in radio broadcasting if ill-conceived LPFM becomes a reality as it stands today.

I strongly object and LPFM service and the manner in which this rulemaking proceeding has been conducted.

Sincerely,

A handwritten signature in cursive script that reads 'Donna Baker'.

Donna Baker
General Manager